

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES *ex rel.* JONATHAN
D'CUNHA, M.D.

Plaintiffs,

v.

JAMES D. LUKETICH, M.D., THE
UNIVERSITY OF PITTSBURGH
MEDICAL CENTER, AND
UNIVERSITY OF PITTSBURGH
PHYSICIANS,

Defendants.

CASE NO. 19-495

DISTRICT JUDGE CATHY BISsoon

**RELATOR'S MOTION FOR LEAVE TO FILE UNDER SEAL A MOTION TO AMEND
AN UNDER SEAL ORDER**

Pursuant to Local Rule 5.2(H), Relator Jonathan D'Cunha, M.D., respectfully requests leave to file under seal a motion to amend the Court's August 31, 2021 Order (Dkt. 62) ("August 31 Order"), which remains under seal. The motion would address the subject and content of the August 31 Order, as well as other under seal filings that that Order addresses. Accordingly, Relator believes that his motion to amend the August 31 Order should also be filed under seal.

Respectfully submitted,

Dated: September 29, 2021

/s/ Andrew M. Stone
Andrew M. Stone
PA ID No. 35176
astone@stone-law-firm.com
STONE LAW FIRM, LLC
437 Grant Street, Suite 1806
Pittsburgh, PA 15219
Tel: (412) 391-2005

Claire M. Sylvia, *pro hac vice*
CA 138990
csylvia@phillipsandcohen.com
PHILLIPS & COHEN LLP
100 The Embarcadero, Suite 300
San Francisco, CA 94105
Tel.: (415) 836-9000
Fax: (202) 833-1815

Jeffrey W. Dickstein, *pro hac vice*
FL 434892
jdickstein@phillipsandcohen.com
PHILLIPS & COHEN LLP
One Biscayne Tower
2 South Biscayne Blvd., Suite 1600
Miami, FL 33131
Tel: (305) 372-5200

Amy L. Easton, *pro hac vice*
DC 43710
aeaston@phillipsandcohen.com
PHILLIPS & COHEN LLP
2000 Massachusetts Avenue, NW
Washington, DC 20036
Tel.: (202) 833-4567
Fax: (202) 833-1815

Counsel for *Qui Tam* Plaintiff-Relator

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of September, 2021, a true and correct copy of the foregoing document was filed electronically using the CM/ECF filing system, which will automatically send email notification of the filing to each counsel of record.

/s/ Andrew M. Stone
Andrew M. Stone

Counsel for Relator